

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

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|---------------------------|---|----------------------|
| JASON MCLEAN and |) | |
| BRIAN COLEMAN, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | Civ. No.: 06-617-SLR |
| |) | |
| COMMUNICATIONS |) | JURY TRIAL DEMANDED |
| CONSTRUCTION GROUP, LLC., |) | |
| |) | |
| Defendant. |) | |

MOTION TO EXTEND DEADLINE FOR REPLY BRIEF

The Plaintiffs, Jason Mclean and Brian Coleman, through undersigned Counsel hereby request that the reply brief deadline for summary judgment motions be extended.

In support of this Motion, Plaintiffs respectfully assert as follows:

1. Counsel for the Plaintiffs, Ronald G. Poliquin was taken to Kent General Hospital Emergency Room on the evening of December 3, 2007 for a severe tongue laceration. *Emergency Department Discharge Record attached hereto as Exhibit A.*
2. Due to the severity of the injury, counsel is expected to be out of the office for several days.
3. Counsel is being treated with pain medication and has been advised not to work or to drive. *See Exhibit A.*
4. The reply brief deadline is Thursday, December 6, 2007.
5. Counsel is requesting a fifteen (15) day extension to file Plaintiffs Reply Brief.
6. Counsel respectfully asks this Honorable Court to grant this extension due to the reasons set forth above.

YOUNG, MALMBERG & HOWARD, P.A.

/s/ Kenneth J. Young

Kenneth J. Young, Esquire

I.D. No. 2048

30 The Green

Dover, DE 19901

(302) 672-5600

Attorneys for Plaintiffs

DATED: December 4, 2007

EXHIBIT A



K07337-01154 00-2123959 QEK
 POLIQUIN, RONALD
 M DOB: 10/20/1977 30Y (302) 229-2430
 PHYSICIAN, EMERGENC 12/03/07

EMERGENCY DEPARTMENT DISCHARGE RECORD

Kent General Hospital emergency personnel are specially trained to deal with emergencies. While we are here to help with your immediate health problems, the treatment you receive is not meant to take the place of the complete care your doctor will give you. We will advise your local family doctor what we have treated you for by sending him/her a copy of your Emergency Department Record. In most cases, we recommend that you see your family doctor for follow-up care. If you do not have a family doctor please tell us, and we will give you a list of names for you to choose from.

SPECIAL INSTRUCTIONS:

salt water rinse 1 three times
 daily soft diet for 24 hrs.
 brush teeth normally

MEDICATION INSTRUCTIONS:

- ☒ Fill prescriptions and take medications according to directions.
- ☒ Do not drink alcohol or take sedatives with this medication.
- ☒ Do not drive, operate machinery, or perform dangerous tasks while taking this medication.
- ☐ Take this medicine with food.
- ☐

FOLLOW-UP INSTRUCTIONS:

- ☐ See your family doctor.
- ☐ Return to the Emergency Department.

☐ in 7-14 days Call for appointment
☐ on _____ at _____

- ☒ See Dr. ATTTT
- ☒ No work / school while taking dantrol
- ☐ Light duty _____
- ☐ May return to work / school _____
- ☐ Call for Occupational Health Appointment _____
- ☐ No gym / sports

PHYSICIAN SIGNATURE: ATTTT

I UNDERSTAND THAT:

I should see my family doctor or return to the Emergency Department if I become worse or develop further problems.
 If x-rays were taken, they will be read by a radiologist and I may be called for a recheck or further x-rays if necessary.

I am responsible for my follow-up care.

I have received the above instructions and they were explained to me by an emergency physician or nurse.

DATE: 12/3/07

TIME: 2:15

INSTRUCTED BY: [Signature]

I have read and understand these instructions.

RESPONSIBLE PARTY: [Signature]



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Distribution:

WHITE - CHART YELLOW - PATIENT

Form No. PX# 1185 REV 1/07

EMERGENCY

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JASON MCLEAN and
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Civ. No.: 06-617-SLR

JURY TRIAL DEMANDED

ORDER

AND NOW, it is hereby ORDERED that the above Motion to Extend Deadline for Reply Brief is approved and Plaintiffs Reply Brief is due on December 19, 2007 and entered this ____ day of _____, 2007.

Judge Sue L. Robinson

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Civ. No.: 06-617-SLR

JURY TRIAL DEMANDED

CERTIFICATE OF MAILING

I certify that on this 4th day of December 2007, I caused to be served one (1) copy of the foregoing Motion to Extend Deadline for Reply Brief on the following parties via United States Mail, postage prepaid:

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